

Message

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**From:** Corey Shircliff [Corey.Shircliff@la.gov]  
**Sent:** 3/19/2021 2:47:47 PM  
**To:** Pham, Lisa [Pham.Lisa@epa.gov]  
**CC:** Stephen Lee [Stephen.Lee@la.gov]; Laura Sorey [Laura.Sorey@LA.GOV]; Kelly, Suzanne [Kelly.Suzanne@epa.gov]; Przyborski, Jay [Przyborski.Jay@epa.gov]; Newman, Sharon [Newman.Sharon@epa.gov]  
**Subject:** RE: Final Package

Lisa, see responses below:

- 1.) If the legislature does not remove the cap, we will only be able to add four new staff instead of seven. All programmatic expenses have to pass through the CDGST according to La R.S. 30:1110, which of course is currently limited to \$750,000.
- 2.) We are very optimistic that the cap will be removed. We currently have a sponsor in the legislature who will move the proposed changes forward in a bill. However, if it is not removed, we are exploring ways to shift the financial burden to the applicants by enlisting third party contractors for permit review.

Please let me know if you need any other information.

Thanks,  
Corey

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**From:** Pham, Lisa [mailto:Pham.Lisa@epa.gov]  
**Sent:** Wednesday, March 17, 2021 3:10 PM  
**To:** Corey Shircliff <Corey.Shircliff@la.gov>  
**Cc:** Stephen Lee <Stephen.Lee@la.gov>; Laura Sorey <Laura.Sorey@LA.GOV>; Kelly, Suzanne <Kelly.Suzanne@epa.gov>; Przyborski, Jay <Przyborski.Jay@epa.gov>; Newman, Sharon <Newman.Sharon@epa.gov>  
**Subject:** RE: Final Package

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Corey,

Sorry that it has taken longer than we anticipated. Specifically, we have been discussing with many different people/programs from EPA to get the appropriate answer for your reporting frequency question (Page 6 of the draft MOA Addendum) and funding issue (Page 4 of the draft PD).

Having said that, could you please let us know:

- 1) How would LDNR anticipate funding the 2<sup>nd</sup> year program estimate (1.135 million) on the off chance that the LA legislature doesn't remove the annual funding cap of \$750,000? For example permit fees, forward funding from first year etc. ?
- 2) Could this alternative funding approach be used if for some reason(s) the cap is never removed?

On another subject, we would like to provide the attached AG Statement from Wyoming, one of EPA's Class VI Primacy States, to be used as a template/reference for LDNR submittal.

Regards,

Lisa

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**From:** Corey Shircliff <[Corey.Shircliff@la.gov](mailto:Corey.Shircliff@la.gov)>  
**Sent:** Tuesday, March 09, 2021 5:28 PM  
**To:** Pham, Lisa <[Pham.Lisa@epa.gov](mailto:Pham.Lisa@epa.gov)>  
**Cc:** Stephen Lee <[Stephen.Lee@la.gov](mailto:Stephen.Lee@la.gov)>; Laura Sorey <[Laura.Sorey@LA.GOV](mailto:Laura.Sorey@LA.GOV)>; Kelly, Suzanne <[Kelly.Suzanne@epa.gov](mailto:Kelly.Suzanne@epa.gov)>; Przyborski, Jay <[Przyborski.Jay@epa.gov](mailto:Przyborski.Jay@epa.gov)>; Newman, Sharon <[Newman.Sharon@epa.gov](mailto:Newman.Sharon@epa.gov)>  
**Subject:** RE: Final Package

Lisa,

Not a problem. Please see the attached.

Corey

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**From:** Pham, Lisa [<mailto:Pham.Lisa@epa.gov>]  
**Sent:** Tuesday, March 9, 2021 1:21 PM  
**To:** Corey Shircliff <[Corey.Shircliff@la.gov](mailto:Corey.Shircliff@la.gov)>  
**Cc:** Stephen Lee <[Stephen.Lee@la.gov](mailto:Stephen.Lee@la.gov)>; Laura Sorey <[Laura.Sorey@LA.GOV](mailto:Laura.Sorey@LA.GOV)>; Kelly, Suzanne <[Kelly.Suzanne@epa.gov](mailto:Kelly.Suzanne@epa.gov)>; Przyborski, Jay <[Przyborski.Jay@epa.gov](mailto:Przyborski.Jay@epa.gov)>; Newman, Sharon <[Newman.Sharon@epa.gov](mailto:Newman.Sharon@epa.gov)>  
**Subject:** RE: Final Package

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Good afternoon Corey,

Could you please send us the MOA Addendum and the PD version that you presented during our Teams Meeting early this week.

Thanks.

Lisa

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**From:** Corey Shircliff <[Corey.Shircliff@la.gov](mailto:Corey.Shircliff@la.gov)>  
**Sent:** Thursday, March 04, 2021 12:44 PM  
**To:** Pham, Lisa <[Pham.Lisa@epa.gov](mailto:Pham.Lisa@epa.gov)>  
**Cc:** Stephen Lee <[Stephen.Lee@la.gov](mailto:Stephen.Lee@la.gov)>; Laura Sorey <[Laura.Sorey@LA.GOV](mailto:Laura.Sorey@LA.GOV)>  
**Subject:** RE: Final Package

Lisa,

LDNR has made changes to the Program Description and MOA Addendum based on comments from you and Suzanne. We do have a few outstanding questions – would you both be available for a quick Zoom or Teams early next week to go over these two documents? We can share our screen to talk about specific items in the documents. Monday is wide open and Tuesday morning looks good as well.

Corey

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**From:** Pham, Lisa [<mailto:Pham.Lisa@epa.gov>]  
**Sent:** Wednesday, March 3, 2021 10:21 AM  
**To:** Corey Shircliff <[Corey.Shircliff@la.gov](mailto:Corey.Shircliff@la.gov)>  
**Cc:** Stephen Lee <[Stephen.Lee@la.gov](mailto:Stephen.Lee@la.gov)>; Laura Sorey <[Laura.Sorey@LA.GOV](mailto:Laura.Sorey@LA.GOV)>  
**Subject:** Final Package

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Good morning Corey,

Please make sure these items are included in LDNR final application:

- 1) Program Description
- 2) Attorney General's Statement (signed)
- 3) Modified MOA (signed by state and R6 RA)
- 4) Electronic copies of all applicable State statutes and regulations, including those governing State administrative procedures;
- 5) Completed Crosswalk (updated to reflect changes after public participation process)
- 6) Modified Governor's letter (signed)
- 7) Documentation of public participation process per §145.31(b) (electronic copies of all written comments received by the State; a transcript, recording or summary of any public hearing held by the State; and a responsiveness summary which identifies the public participation activities conducted, describes the matters presented to the public, summarizes significant comments received, and responds to these comments.)

Thank you.

Lisa

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**From:** Corey Shircliff <[Corey.Shircliff@la.gov](mailto:Corey.Shircliff@la.gov)>  
**Sent:** Monday, March 01, 2021 4:10 PM  
**To:** Pham, Lisa <[Pham.Lisa@epa.gov](mailto:Pham.Lisa@epa.gov)>  
**Cc:** Stephen Lee <[Stephen.Lee@la.gov](mailto:Stephen.Lee@la.gov)>; Laura Sorey <[Laura.Sorey@LA.GOV](mailto:Laura.Sorey@LA.GOV)>; Johnson, Ken-E <[Johnson.Ken-E@epa.gov](mailto:Johnson.Ken-E@epa.gov)>; Kelly, Suzanne <[Kelly.Suzanne@epa.gov](mailto:Kelly.Suzanne@epa.gov)>; Newman, Sharon <[Newman.Sharon@epa.gov](mailto:Newman.Sharon@epa.gov)>; Przyborski, Jay <[Przyborski.Jay@epa.gov](mailto:Przyborski.Jay@epa.gov)>  
**Subject:** RE: EPA Review on LDNR Draft Program Description

Thank you Lisa! We will review and get back with you if we have any questions.

While you and EPA staff have been busy reviewing this, we've completed a few actions ourselves:

1. The numbering inconsistencies identified by you last month were addressed by the Louisiana Register publication staff, so we now have a corrected version of the rule with appropriate numbering,
2. The Louisiana Register staff also changed the numbering scheme so that each section is prefaced by 33 rather than 3 (e.g. section 307 is now 3307). This is apparently non-negotiable, so we've updated the Crosswalk accordingly and will do the same with the Program Description.
3. We made the recommended changes to the MOA and that document is currently with our Executive Council for review.

We hope to turn this around very quickly – our understanding is that we should be able to get the AG and Governor's letters very soon. The plan is to resubmit the crosswalk, program description, MOA, AG's letter, and Governor's letter in one bundle HOPEFULLY within the next couple of weeks.

Thanks again for your valuable feedback. Best,

Corey Shircliff, P.G.  
Geologist Manager  
Louisiana Injection & Mining Division  
(225)342-5586

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**From:** Pham, Lisa [<mailto:Pham.Lisa@epa.gov>]  
**Sent:** Monday, March 1, 2021 3:45 PM  
**To:** Corey Shircliff <[Corey.Shircliff@la.gov](mailto:Corey.Shircliff@la.gov)>  
**Cc:** Stephen Lee <[Stephen.Lee@la.gov](mailto:Stephen.Lee@la.gov)>; Laura Sorey <[Laura.Sorey@LA.GOV](mailto:Laura.Sorey@LA.GOV)>; Johnson, Ken-E <[Johnson.Ken-E@epa.gov](mailto:Johnson.Ken-E@epa.gov)>; Kelly, Suzanne <[Kelly.Suzanne@epa.gov](mailto:Kelly.Suzanne@epa.gov)>; Newman, Sharon <[Newman.Sharon@epa.gov](mailto:Newman.Sharon@epa.gov)>; Przyborski, Jay <[Przyborski.Jay@epa.gov](mailto:Przyborski.Jay@epa.gov)>  
**Subject:** EPA Review on LDNR Draft Program Description

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Good afternoon Corey,

We've completed our review of your draft Program Description (please see attached).

If you have any question, please don't hesitate to let us know.

Thank you.

Lisa Pham  
Environmental Engineer  
U.S. EPA Region 6  
1207 Elm Street  
Dallas, Texas 75207

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